

Public Involvement: Why is it important?

Be a good neighbor:

More and more businesses are learning that being a good citizen means demonstrating commitment to the community. The best way to do that is to engage the public throughout project development and planning processes.

Stay on track and avoid costly delays:

Public understanding of the need for a proposed project leads to better and more durable decisions by reducing the likelihood of appeals. A participatory approach to decision-making increases the likelihood of a smoother permitting process.

Long-term investment:

Investing small amounts of time and effort upfront and throughout the process reaps large rewards for your company later. Collaborative problem-solving builds unity and a unified community is a better place to live, work, and play for everyone.

Public Involvement: How to get started

We'll help you:

DHEC's Public Participation staff is well-versed in the concepts and techniques of community involvement. Contact us early and use us as a resource. We'll work with you to identify leaders in your community and connect you to other companies who understand the importance of community involvement.

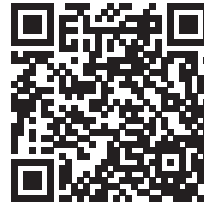
Get to know your neighbors:

Meet community members and identify leaders. Connect with homeowners' associations, county leaders, and community councils. Relate to them and allow them to get to know you as a person, not just a faceless company.

Get on agendas:

Social and civic clubs and organizations often need speakers. Use their regular meetings as opportunities to inform and educate members about your company and/or project. Check for local chapters of groups such as the Rotary Club, Lions Club, Elks Club, Kiwanis, or League of Women Voters.

***For additional information on PSD,
contact Steve McCaslin, P.E. at
(803) 898-4123.***



Bureau of Air Quality

2600 Bull Street • Columbia, SC 29201

803-898-4123

www.scdhec.gov/Environment/AirQuality/Training



South Carolina Department of Health
and Environmental Control

Simplifying the Air Permitting Process

Prevention of Significant Deterioration (PSD)

BUREAU OF AIR QUALITY
Engineering Services Division

Common PSD Application Pitfalls & Helpful Tips

Prevention of Significant Deterioration (PSD) applies to new major sources or major modifications at existing sources for pollutants where the source is located in an area that is in attainment or is unclassifiable with the National Ambient Air Quality Standards (NAAQS). For additional information on PSD, visit EPA's website at www.epa.gov/nsr/psd.html.

A Prevention of Significant Deterioration (PSD) air permit review is a complex process. Help avoid pitfalls and delays by following the tips below.

Discuss Regulatory Approaches Prior to Application Submittal:

Prior to submitting your PSD permit application, arrange a pre-application meeting. We recommend the meeting take place at least 90 days before the application is submitted. In the meeting, talk about your approaches to calculations, technology reviews, and modeling. All of the items in this document should be discussed in detail in the meeting. The Department recommends the applicant discuss the methods and approaches to using applicability tests early in the process, especially if using the "could have accommodated" approach.

Calculations: Provide detailed calculations in the application. Explain differences in emission factors used from previous application submittals.

Provide complete source tests if you plan to rely on source tests that have not been approved by the Department. A complete source test includes summary results, test protocol and all the information specified in S. C. Regulation 61-62.1, Section IV-Source Tests, presented in the English language.

Existing sources: Please remember that "project netting" is not allowed. When determining if a significant increase in emissions occurs, you must include only increases associated with the project. If the second step is required, the "net emissions increase" review, include all emissions increases and decreases that occurred in the contemporaneous period and provide a description of those projects in the analysis. Provide an explanation if any increases were not included in the netting analysis. Keep in mind that facility-wide impacts to existing sources need to be fully explained, even if the proposed changes are to remove bottlenecks.

If using the "actual-to-projected-actual applicability test", include detailed calculations and the basis in each calculation.

If using the "hybrid" approach to calculating emissions, clearly distinguish what allowable emissions test was applied to each existing impacted source (i.e. actual to potential test OR actual to projected actual test)

Emission data should reflect the baseline period chosen. If there is stack test data available for that baseline period and the facility is using emission factors derived from tests conducted outside the baseline period, justify the use of that data.

RACT/BACT/LAER Clearinghouse (RBLC): Provide a detailed explanation and discussion of the RBLC findings. Be sure to look at technologies outside RBLC, such as technology transfer (technologies that have not previously been used for this particular type of unit in this particular industry but that can be adopted from other industries), prior testing history on existing units, and information on sources outside the U.S. For proposed modifications to existing sources, review historic test data in determining the limit. If the proposed PSD limit is less stringent than other emission limits/data, provide a full discussion of why those limits are not appropriate.

BACT Review: The best available control technology (BACT) review is a top down review. The applicant should use the five step BACT review as outlined and explained in the EPA Draft 1990 NSR Workshop Manual. No steps should be skipped. Provide a full, detailed BACT review and present in a format that provides a clear demonstration of what the applicant has determined to be BACT for a source and pollutant. If operating ranges are discussed in the control device elimination process, provide references.

Compliance Demonstration: The application should adequately address how the facility will demonstrate compliance with the PSD limits being established (i.e. continuous emission monitors (CEMS), stack test, monitoring, etc.).

Modeling: A modeling protocol describing the methods that will be used for the air quality analysis must be submitted for review, comment and approval prior to the submittal of the PSD application. This protocol should include justification of the appropriateness of the meteorology as well as the background concentrations that are to be used.

All parts of the air quality analysis must be addressed in the application, including those elements that may not require actual modeling to be done, such as an ozone analysis for volatile organic compounds (VOC) or nitrogen oxides (NOx) major PSD projects. The Class I Air Quality Related Values analysis and Class II Additional Impacts Analysis must also be addressed for all PSD projects.

More Application Tips

Checklist for PSD

A complete application should include all information required for by the state construction permit program in addition to the requirements of S.C. Regulation 61-62.5, Standard 7:

- **Plant Information:** location, design capacity, operating schedule, schematic drawings, schedule for construction, BACT description, emission rate calculations. There should be enough description to understand the process and to understand the emissions.
- **Air Quality Monitoring (preconstruction):** If not conducting site specific preconstruction monitoring, the facility must propose and obtain approval for an existing DHEC ambient monitoring.
- **BACT analysis:** A BACT analysis should be included in the application for each pollutant and each emission unit which is subject to the PSD review.
- **Stack height review:** Are any stacks over Good Engineering Practice (GEP) stack height? The application should include GEP calculations using building dimensions.
- **Air Dispersion Modeling:** National Ambient Air Quality Standards (NAAQS) and Class II Increment modeling. Full impact modeling (including Class II increment consumption) if project modeling results are above significant impact concentrations. Modeling must be performed using EPA-approved models.
- **Class II Additional impact analysis:** Address expected impact to visibility, soils, and vegetation caused by the PSD project and any associated industrial, commercial, and residential growth.
- **Class I Review:** Address Class I increments. Also, as soon as possible, involve the Federal Land Managers (FLMs) of any Class I Areas within 300 km of the PSD project and address Air Quality Related Values (visibility or regional haze and deposition) in the application.

To view a map of South Carolina Class I Impact Areas with a 300 km buffer, visit www.scdhec.gov/Environment/docs/PSD-ClassImap.pdf.